## Exhibit C

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Confidential - Subject To Protective Order

January 29, 2014

## Via Email

Robert D. Cheesebourough Matthew D. Boruta Cheesebourough & Boruta 543 E Market Street Indianapolis, IN 46204 Frederick D. Emhardt Jeffrey A. Townsend Plews Shadley Racher & Braun LLP 1346 North Delaware Street Indianapolis, IN 46202-2145

Re: Cox, Andrew & Lucinda; Stephanie Snyder v. Sherman Capital LLC, et al.; USDC-So. Dist. of Indiana, Case No. 12-cv-1654.

## Dear Counsel:

Attached please find the relevant umbrella policy for Defendants. Plaintiffs asserted in their motion to compel that Defendants had only produced two portfolio purchase agreements. As set forth in Defendants' response brief, Defendants previously produced the portfolio purchase agreements Plaintiffs requested. These purchase agreements appear at the following Bates ranges:  $SO\ 0001 - 0019$ ; SOIII-0001 - 0388. For your convenience, we are also sending them to Mr. Townsend via email.

We are in the process of preparing supplemental responses to Plaintiffs' discovery requests related to the ownership of the entity Defendants. However, in the interest of providing that information promptly, Defendants provide the information in this letter pursuant to the protective order entered in this case:

Sherman Capital LLC is owned by the following individuals and entities:

Huger St LLC; Moultrie St LLC; Woolf St LLC; Fulton St LLC; Robert Roderick; Avondale St LLC; Jasper St LLC; Concord St LLC; Robert Banasik; Scott Kester; Hagood St LLC; Charlotte St LLC; Archdale St LLC; Jacobs Alley LLC; Peachtree Street LLC; Greenhill St LLC; Daniel Picciano III; Amanda Smith; James Wagner; Philip T. Thurmond III; Michael Keaton; Chalmers St LLC; Gregory Hammond; Jon Mazzoli; Princess St LLC; Terry O'Connell; Dennis Grady; R Roderick trust.

Sherman Capital Markets LLC is wholly owned by Sherman Capital Group Inc.

Mr. Robert Cheeseborough

Mr. Matthew Boruta

Mr. Frederick Emhardt

Mr. Jeffrey Townsend

January 29, 2014

Page 2

Very truly yours,

/s Gary S. Caplan

GSC:ew

cc: James W. Riley (via email)

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